

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MDL No. 3076
CASE NO. 1:23-md-03076-KMM**

IN RE:

FTX Cryptocurrency Exchange Collapse MDL Litigation

THIS DOCUMENT RELATES TO:

All Actions

**MDL PLAINTIFFS’ OMNIBUS RESPONSE IN OPPOSITION TO
“LUCKY D PLAINTIFFS” REVISED RULE 24 LIMITED-PURPOSE MOTIONS TO
INTERVENE AND FOR SETTLEMENT-RELATED RELIEF**

On November 20, 2025, Plaintiffs filed their Response in Opposition, [ECF No. 1018] (the “Opposition”), to the “Lucky D Plaintiffs” Rule 24 Limited Purpose Motion to Intervene and for Settlement-Related Relief. [ECF No. 1007]. Defendant Prager & Metis CPAs, LLC, filed a joinder in that Opposition on November 21, 2025. [ECF No. 1023].

Also on November 21, 2025, the Lucky D Plaintiffs filed two “Revised” motions to intervene, [ECF Nos. 1021, 1022]. Neither “Revised” motion alters MDL Plaintiffs’ positions asserted in their Opposition. In an abundance of caution, MDL Plaintiffs fully incorporate their Opposition by reference as if fully set forth against these “Revised” motions.

However it is characterized, the Lucky D Plaintiffs’ motion [ECF Nos. 1007, 1021, 1022] should be denied outright, for all the reasons stated in the Opposition. Movants never meaningfully conferred with MDL Plaintiffs before filing their motion with the Court, and they fail to meet the requirements for either mandatory or permissive intervention.

CASE NO. 1:23-md-03076-KMM

CONCLUSION

The Court should deny Movants' motion in full. If the Court is inclined to consider any aspect, it should require a proper conferral first and defer any dispute to the established Rule 23 process at preliminary and final approval.

Dated: November 26, 2025.

Respectfully submitted,

By: /s/ Adam Moskowitz

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CASE NO. 1:23-md-03076-KMM

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 26, 2025, a true and correct copy of the foregoing was filed electronically with the Clerk of the Court, by using the CM/ECF system which will send an electronic notification of such filing to all counsel of record.

By: /s/ Adam M. Moskowitz
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